WaferTech is hereby submitting to the Department of Ecology written comments on the proposed Industrial Stormwater General Permit:

S4 Monitoring Requirements: 1. "All samples will be grab samples taken within the first hour of discharge".

3. "The storm event sampled must be at least 0. 1 inches of rain in a 24-hour period".

Facilities typically set-up courier service and analysis with off-site labs as soon as possible on the day a sample will be taken. Each permitted facility in the State of Washington will spend an estimated 2-3 hours of time to take samples. Estimated cost per sampling event would be approximately $100.00. The decision to sample within the first hour of discharge will result in samples sent to labs for analysis, later to discover the storm event did not meet requirement # 3. This requirement will cause confusion-does this storm qualify or doesn't it?, overload analytical labs and increase expense for accredited labs and permittees. The sampling expense for 8 consecutive quarters could easily double, when considering these "non-qualifying samples".

S4 Monitoring Requirements: A 2. pH limit of 6-9

Clark County has acidic rainfall, which is typically below pH 6.0, please see attached pH graph for 1987-2001 taken from precipitation data sampled by the National Atmospheric Deposition Program. This program samples trends and maps data on major ions contained in precipitation throughout the United States.

The Fact Sheet Summary states on page 30 " Rainfall is slightly acidic as it hits the ground but buffers quickly achieving near neutral pH". DOE is assuming the buffer effect will *always occur.*

WaferTech comments (continued)

The Summary states that "pH is included in the base level monitoring requirements to determine how acidic/alkaline the discharge is." This information can be gathered by sampling pH and reporting, without any established limits.

EPA's program on Acid Rain states that " about half of the acidity in the atmosphere falls back to earth through dry deposition. The wind blows these acidic particles and gases onto buildings, cars, homes, and trees. Dry deposited gases and particles can also be washed from trees and other surfaces by rainstorms. When that happens, the runoff water adds those acids to the acid rain, making the combination more acidic than the falling rain alone. Prevailing winds blow the compounds that cause both wet and dry deposition across state and national borders, and sometimes over hundreds of miles."

The Summary for the Draft Permit states on page 31: "If the stormwater discharge is strongly acidic, 5 or lower, or strongly alkaline, 10 or above, the Permittee should immediately begin looking for a source of contamination". How will DOE address those

Permittee's where the source of contamination is off-site? These facilities should not be considered "out of compliance" due to circumstances beyond their control.

The EPA also states that "normal rain is slightly acidic because carbon dioxide dissolves into it, so it has a pH of 5.5." Requiring a pH limit for stormwater would be extremely difficult to control.

S4 Monitoring Requirements: A 3. Additional Metal Sampling "If the value for zinc exceeds the benchmark value for 2 consecutive quarters, beginning with next sampling quarter the Permittee shall include analysis for copper and lead… for the remainder of the permit term".

This requirement is apparently based on a study in Connecticut, which linked higher zinc levels to higher copper & lead levels. DOE is assuming conditions in Connecticut are similar to the State of Washington. Sampling for copper & lead should not be performed for the remainder of the permit term. Sampling requirements for copper & lead, if required, should be consistent with all other sampling frequencies.